



THOMAS AMBROSIO
ATTORNEY AT LAW

Member of NJ & NY Bars

January 20, 2016

Via ECF

Robert Frazer
Assistant United States Attorney
District of New Jersey
970 Broad Street, Suite 700
Newark, NJ 07102

Re: USA vs. Farad Roland
Crim. No. 12-298 (ES)
Discovery Request – Pursuant to Rule 16, *Brady vs. Maryland*
Second request letter dated 1/20/16

Dear Mr. Frazer:

Based upon my ongoing review of the discovery and trial preparation of this case I hereby make the following additional discovery request pursuant to Rule 16 and *Brady vs. Maryland* :

1. All reports related to the 8/16/08 homicide associated with Newark CC# 08-67851
2. All reports related to the 4/16/08 shooting-hit associated with Newark CC# 08-32150

The incidents mentioned in items 1 and 2 above are mentioned in a Ballistics Laboratory Report (bates stamp 51.0027) and link the same gun used in those incidents to the gun used in the Oasis Bar double homicide.

It is the defense's position that the above requested discovery must be produced as (1) Rule 16 discovery and as (2) *Brady* material since it may help exonerate Mr. Roland, *i.e.* the discovery may establish that perpetrator(s) of the Oasis Bar double homicide may have been committed by someone other than Farad Roland.

3. Any addendums to the **February 19, 2008 South Side Cartel Criminal Organization Intelligence Assessment** (bates stamp 99.0001)

According to page 3 of this report "All data received will be verified and confirmed. This will enable this document to evolve with the changing dynamics of the subject matter." (bates stamp 99.0003)

It is the defense's position that any addendums to the February 19, 2008 report are discoverable under Rule 16 and potentially under *Brady*.

The Government's cooperation in compiling and turning over the above requested discovery appreciated. If any of the requested documentation has already been turned over to the defense then kindly advise me of the bates stamp numbers for any such document. Any request for discovery already turned over is inadvertent on my part due to the large volume of discovery connected with this case.

Very truly yours,

/s/Thomas Ambrosio
Thomas Ambrosio

cc: Richard Jasper, Esq.
Michael Bachrach, Esq.
AUSA Courtney Howard
AUSA Robert Feitel
Farad Roland (via regular mail)